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*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JOSE ORTIZ p/k/a JAO

Plaintiff,

07 CV 3897  
(RWS)

-against-

ECF CASE

GUITIAN BROTHERS MUSIC INC., OSCAR  
GUITIAN, and UNIVERSAL MUSIC GROUP  
DISTRIBUTION, INC.

**PLAINTIFF'S INITIAL  
DISCLOSURES**

Defendant(s).

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Pursuant to Fed. R. Civ. P 26(a)(1), the Plaintiff JOSE ORTIZ p/k/a JAO  
(hereinafter the "Plaintiff"), by and through its counsel, sets forth its initial disclosures  
("Initial Disclosures") as follows:

Plaintiff makes these Initial Disclosures based on its current knowledge,  
recognizing that its investigations are continuing. By making these Initial Disclosures,  
Plaintiff does not represent that he is identifying every document, tangible thing, or  
witness potentially relevant to this Action. Plaintiff submits these Initial Disclosures  
subject to the understanding that they will not limit Plaintiff's discovery in this Action or  
Plaintiff's right to supplement or amend these Initial Disclosures in the future. Finally,  
Plaintiff does not waive his right to object to the production of any particular document  
pertaining to the Initial Disclosures herein on any basis, including without limitation

attorney-client privilege, work product, relevancy, materiality, undue burden, hearsay or any other relevant objection to its discoverability or use as evidence.

A. The following are the names and addresses, to the extent known, of each individual likely to have discoverable information that Plaintiff may use to support his claims or defenses.

1. Oscar Guitian  
662 SE 6<sup>th</sup> Place  
Hialeah, FL 33010
2. A representative from Guitian Brothers Music, Inc.  
8051 N.W. 36 Street,  
Doral, FL 33166
3. A representative from Universal Music Group Distribution Corp.  
c/o Jeff Schwartz  
10 Universal City Plaza  
Universal City, CA 91608
4. Jose Ortiz p/k/a Jao  
520 West 151<sup>st</sup> Street, Apt. 3B  
New York, NY 10031

B. The following is a description by category and location of all documents, data compilations, and tangible things that are in the possession, custody, or control of the Plaintiff that the Plaintiff may use to support their defenses.

1. Exhibits attached to the Plaintiff's Complaint.
  2. A copy of the DVD "Su Vida y la Calle."
  3. Other documents that may become known as discovery in this case
- proceeds.

C. The following is a computation of damages that the Plaintiff claims:

Plaintiff does not have a computation at this time, because the information that would allow computation is exclusively in the Defendants' possession. Plaintiff reserves the right to supplement this response as discovery proceeds.

D. To Plaintiff's knowledge there is no insurance agreement under which any person carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Dated: New York, New York  
August 14, 2007

BARTON, BARTON & PLOTKIN, LLP

By: 

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TO:  
Barry I. Slotnick  
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*Universal Music Group Distribution, Corp.*  
345 Park Avenue  
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Oscar Guitian  
662 SE 6<sup>th</sup> Place  
Hialeah, FL 33010

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